

Raymond L. Bodnar, Esq for

Bodnar Trust U/A Dated 12/28/2008, Respondent

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

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DISTRICT OF PUERTO RICO
SAN JUAN, P.R.

In Re: PROMESA

THE FINANCIAL OVERSIGHT AND	:	Title III
MANAGEMENT BOARD FOR PUERTO RICO	:	No.17 BK 3283 – LTS
As representative of	:	Affidavit Supporting
THE COMMONWEALTH OF PUERTO RICO et :	:	Respondent's Objection
Al.	:	to Disallowance and
Debtors	:	Reclassification of Claim
		No 6850

THREE HUNDRED FIFTY-FIFTH OMNIBUS OBJECTION OF THE COMMONWEALTH OF PUERTO RICO AND THE PUERTO RICO HIGHWAY AND TRANSPORTATION AUTHORITY FOR PETITIONER'S MOTION FOR PARTIAL DISALLOWANCE AND RECLASSIFICATION OF CLAIM NO 6850.

1 I, Raymond L. Bodnar, as legal counsel for Respondent Bodnar Trust U/A dated 12/28/2001 hereby certify that I am the sole Trustee of the Bodnar Trust U/A Dated 2/28/2001 ("Respondent") and submit this Affidavit in support of the Respondent's objection to Petitioner's motion for partial disallowance and partial reclassification of Respondent's Claim No 6850

pertaining to its \$25000 Puerto Rico Highway and Transportation Authority Bond 5.25% due July 1, 2034 CUSIP No 745190R67 ("HTA").

2. Petitioner alleges that Master Proofs of Claims #37245, # 38574 and #32622 submitted by Bank of New York Mellon ("BNYM") includes Respondent's HTA Bond, creating a duplicate claim requiring partial disallowance of Respondent's Claim No 6850.

A) Respondent refutes such allegations in that Respondent contacted BNYM by email in which BNYM responded that BNYM is not familiar with Respondent's HTA bond.. As such, Master Proofs of Claim, submitted by BNYM as alleged by Petitioner do not duplicate Respondent's Claim of Proof No 6850.

3. Petitioner alleges that other unnamed Master Proofs of Claim also duplicate Respondent's Proof of Claim No 6850.

A) Respondent refutes Petition's allegations in that Petitioner does not submit to this Court Master Proof of Claim with specific claim numbers and the name of the organization submitting such Master Proof of Claim, showing a duplication of Respondent's Proof of Claim No 6850 in order for Respondent to verify such allegation of duplication by Petitioner. The submission by Petitioner as to Master Proofs of Claim by BNYM as a duplication of Respondent's proof of

Claim No 6850 has been proven clearly inaccurate now requires the Petitioner to file Master Proofs of Claim with specific Claim numbers and name of submitting organization to allow Respondent to again verify the accuracy of the Petitioner's allegations of duplication.

4. Petitioner alleges that Respondent's Claim No 6850 for \$25000 Puerto Rico Highway and Transportation Bond CUSIP # 745190R67 be reclassified as a liability claim against the Puerto Rico Electric Power Authority.

A) Respondent refutes the Petitioner's allegations as absolutely inaccurate. Respondent filed a separate Proof of Claim for its \$25000 Puerto Rico Electric Power Authority Bond 5% due July 1, 2023 CUSIP # 7452QCL4. Prime Clerk did classify that Proof of Claim with its own Claim No 6737. As such Respondent has two filed separate Proofs of Claim, one being Proof of Claim No 6850 for Respondent HTA Bond and one being Proof of Claim No 6737 for its Puerto Rico Electric Power Authority Bond.

Wherefore, Respondent hereby has submitted sufficient evidence to refute the allegations of Petitioner to partially disallow Respondent's Claim No 6850 and to partial reclassify Claim No 6850 as a liability of the Puerto Rico Electric Power

Authority and for this Court to deny the Petitioner's motion in these regards

Dated

9/15/21


Raymond L. Bodnar, Esq for

Bodnar Trust U/A dated 12/28/2001

I, Raymond L. Bodnar hereby certifies and affirms that the foregoing
information is true. I am aware that if such information is willfully false, I am
subject to punishment.

Dated

9/15/21


Raymond L. Bodnar